## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

:

V. : CR. NO. 1:17-CR-0084-JJM

:

RONNY NOVA :

## **MOTION TO CONTINUE**

Now comes the defendant, Ronny Nova, by and through counsel, and moves this Court to continue all pre-trial scheduling order dates for a period of 45 days. Counsel further moves to exclude this period of time from Speedy Trial Act calculations. As grounds, counsel submits that additional time is necessary to review discovery materials. In addition, plea negotiations with the Government are on-going and additional time is necessary to finalize a plea agreement. The Government has been informed of this request and does not object.

Respectfully submitted, Ronny Nova By his attorneys,

/s/ Michael Lombardi

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/s/ John E. MacDonald

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## **CERTIFICATION**

I hereby certify that on February 14, 2018 a true copy of this document was delivered electronically using the CM/ECF system which will send notification to Paul F. Daly, Jr., U.S. Attorney's Office.

/s/ John E. MacDonald

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